

## PRINCIPLE - 1

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ETHICS, TRANSPARENCY AND ACCOUNTABILITY

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Alembic has in place a Code of Conduct (“Code”) to ensure compliance with legal requirements and business ethos and values. The Code requires that the Directors, Senior Management Personnel and Employees at all levels abide by the said Code of Conduct. The Company expects confirmation of compliance from its employees. The Code has been disseminated across the organization and is also made available on the Company’s website as well as on the local intranet. The Code also ensures good governance, ethical practices, transparency and accountability in conducting affairs of the Company and dealing with stakeholders across the value chain. The Company has also developed a Supplier Code of Conduct which is applicable to all our supply chain associates.

**Policy:** The Company’s conduct in all its sphere of activities while dealing with the internal and external stakeholders will endeavor adherence to the following:

### **1) Maintaining Values**

The Company will endeavor to promote its values as well as demonstrate its commitment to upholding its ethics principles wherever it operates in conjunction with business partners.

### **2) Business Integrity**

The Company will endeavor not to do nor give or receive, directly or indirectly for business or financial gain, any financial inducement or improper advantage, or engage in any form of unethical conduct or exercise undue influence over any third party. The Company expects its employees not to indulge in giving extravagant, lavish or uncustomary gifts to the third parties, which may obligate or appear to obligate or inappropriately influence the recipient.

### **3) Anti-Corruption and Fair Competition**

The Company expects its employees not to engage in or promote practices which are abusive, corrupt and anti-competitive. The Company is committed to competing fairly and complying with appropriate competition laws. The Company’s employees, KMPs, and Board Directors shall adhere to the guidelines and norms including the Anti-Corruption and Anti-Bribery policy prescribed by the Company for accepting and giving gifts.

Our supply chain associates i.e. suppliers, vendors and contractors by virtue of their endorsement of Supplier Code of conduct support our mission for fair competition and commit themselves for not getting involved in unfair trade practices.

### **4) Equal Opportunities**

The Company will provide equal opportunities to all its candidates/ employees and all qualified applicants for employment, without regard to their race, caste, religion, colour, ancestry, marital status, gender, sexual orientation, age, and nationality. The Company and its

supply chain associates will maintain a work culture that strictly prohibits any form of discrimination.

#### **5) Conflict of Interest**

The Company shall take appropriate steps to identify the potential conflict of interest in business transactions and take measures to avoid any such conflicts. The Company shall adopt requisite due diligence mechanisms on this aspect for its directors, KMPs, and employees. It is also incumbent upon all interested parties to promptly disclose any conflicts of interest. At

#### **6) Redressal Mechanism**

The Company shall develop, adopt and implement an appropriate redressal mechanism with formal procedures, for all stakeholders which shall be communicated with respective stakeholders.

#### **7) Accuracy of Records and Disclosures**

The Company shall make all reasonable efforts including by way of internal controls, third party reviews/audits, to vouch for completeness, validity, and accuracy of the records, financial or otherwise and the validity of all information. It will make all reasonable efforts to ensure that all its public announcements are accurate, complete, fair, timely and understandable and comply with all applicable laws and regulations.

#### **8) Transparent Communication and Access to Information**

The Company will endeavor that all the requisite information is communicated in a transparent manner to all those who are concerned and are required to be informed about the same. The Company follows an open-door policy, ensuring that everyone is approachable and can communicate freely without fear or favor. The Company will also endeavor ease of access to information across the entire value chain which includes its external stakeholders, whilst maintaining appropriate safeguards for confidentiality and statutory requirements.

#### **9) Compliance**

The Company will to the best of its ability comply with all the laws and regulations as applicable to its operations, will encourage everyone involved in its value chain to do the same and deal with compliant supply chain associates.

#### **10) Contractual Obligations**

The Company will take its contractual obligations seriously and will make reasonable efforts to pay its suppliers, employees and others entitled to receive money from it, according to agreed contracts and ensure compliance, with applicable contractual terms.

## **11) General**

The Company will encourage all internal and external parties dealing with it to comply with the above mentioned principles and will try to avoid complicity with anyone that violates above principles.

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